

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

NATALIA CEBOLLERO BERTRÁN
Plaintiff

v.

PUERTO RICO AQUEDUCT AND SEWER
AUTHORITY.
Defendant

CIVIL NO. 3:19-cv-1412 GAG-
BJM

VIOLATIONS OF CLEAN
WATER ACT, NEGLIGENCE;
RIPARIAN RIGHTS

JURY TRIAL DEMANDED

MOTION TO INFORM DISCLOSURE

TO THE HONORABLE COURT:

NOW COMES PLAINTIFF, represented by the undersigned counsels, and respectfully states and prays as follows:

1. Pursuant to the provisions set on the August 25th, 2021, ISC meeting, and to the minute entered (Dkt No. 30), Plaintiff hereby informs that pursuant to the provisions of Rule 26(f), copies of the documents that are in possession of Plaintiff were disclosed to PRASA's counsel.

2. Plaintiff informs that there is the possibility that other documents could be within the late counsel Edelmiro Salas, which are currently in the possession of his heirs. Plaintiff is in the process of contacting counsel Salas' heirs to check his files to see if there could be any other additional documents. Plaintiff informs that if such is the case, Plaintiff will immediately notify all parties and the Court and will disclose them accordingly.

WHEREFORE, plaintiff respectfully requests the Honorable Court to take notice of the above expressed.

RESPECTFULLY SUBMITTED.

At San Juan Puerto Rico, August 30th, 2021.

s/ José Luis Ramírez de León
JOSÉ L. RAMIREZ DE LEÓN, LLM
USDC Bar No. 206910
PO Box 190251
San Juan, PR 00919-0251
Tel. (787) 415-8459
Fax. (787) 282-6682
jramirez639@msn.com
joselramirez@me.com

CERTIFICATE OF SERVICE

I hereby certify that on **August 30, 2021**, I electronically filed the foregoing motion, titled **MOTION TO INFORM DISCLOSURE** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

- **José L. Ramírez de León**, jlr Ramirez639@msn.com jose lramirez@me.com
- **Ana L. Toledo-Davila**, anapuertorico@outlook.com
- **Idalia M. Diaz-Pedrosa**, idaliamarie2000@gmail.com, lydiat@centennialpr.net
- **A. J. Bennazar-Zequiera** ajb@bennazar.org, bgm.csp@bennazar.org
- **Carlos R. Ramirez-Isern** carlos.ramirez@bennazar.org,
ramirezisernlegal@gmail.com

At San Juan Puerto Rico, **August 30, 2021**.

s/ José Luis Ramírez de León
JOSÉ L. RAMÍREZ DE LEÓN, LLM
USDC Bar No. 206910
PO Box 190251
San Juan, PR 00919-0251
Tel. (787) 415-8459
Fax. (787) 282-6682
jlr Ramirez639@msn.com
jose lramirez@me.com